

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

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Attorneys for Plaintiffs

*\*Admitted pro hac vice*

JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

Plaintiffs,

V.

TRAMMELL S. CROW, JR., DR. BENJAMIN

TODD ELLER, RICHARD HUBBARD, DR.

MELISSA MILLER, THE ESTATE OF DR.

JOSEPH BOLIN, DR. SCOTT WOODS, DR.

MRUGESHKUMAR SHAH, MICHAEL

CAIN, COE JURACEK, PHILIP ECOB,

H.J.COLE, TEXAS RANGER CODY

MITCHELL, KURT KNEWITZ, PAUL

PENDERGRASS, RALPH ROGERS,

ROBERT PRUIT, SCOTT BRUNSON, CASE

GROVER, RICHARD BUTLER, MARC

MOLINA, MICHAEL HYNES, JR., SHAWN

MAYER, JADE MAYER, AARON

## BURLINGAME, RCI HOSPITALITY

HOLDINGS, INC., INTEGRITY BASED

## MARKETING, LLC, STORM FITNESS

NUTRITION, LLC.

ULTRA COMBAT NUTRITION, LLC,

ECOLIFT HOMES LLC, ELEVATED

WELLNESS PARTNERS LLC, DOE

INDIVIDUALS 1–50, and DOE

COMPANIES 1–50

**AMENDED COMPLAINT FOR VIOLATIONS OF THE TRAFFICKING VICTIMS  
PROTECTION ACT AND RACKETEERING INFLUENCED AND CORRUPT  
ORGANIZATIONS ACT**